

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SUSAN BEILFUS-PAUL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 07 C 6549
	)	
DERMALOGICA, INC.,	)	Judge Leinenweber
	)	
Defendant.	)	Magistrate Judge Schenkier

**JOINT MOTION TO EXTEND DISCOVERY**

NOW COME Plaintiff, SUSAN BEILFUS-PAUL and Defendant, DERMALOGICA, INC., by and through their respective attorneys, and respectfully request that discovery be extended an additional sixty (60) days, and in support thereof, state as follows:

1. Discovery in the above-captioned matter is set to close on October 13, 2008.
2. To date, the parties have completed written discovery.
3. The completion of written discovery was delayed due to the passing of Plaintiff's mother as well as the resignation of Defendant's corporate human resource manager.
4. The Plaintiff and her former direct supervisor have been deposed.
5. The parties are in the process of scheduling several more depositions. The parties have however encountered difficulties due to the fact that many of the witnesses are no longer under Defendant's control, reside out of state and work in sales with extensive geographic territories and travel schedules.
6. Additionally, counsel for Plaintiff is scheduled to be on trial in the United States District Court for the Southern District of Iowa (Davenport, Iowa) before the Honorable Judge Pratt

in the case of Ward v. Von Maur, Case #04-CV-00159-RP-RAW, beginning on October 20, 2008. The case involves five remaining plaintiffs, after the Judge's summary judgment ruling, on a failure to hire case and Plaintiff's counsel in this matter is one of the team of attorneys representing Defendant Von Maur. Counsel anticipates trial and preparation therefore to begin in Rock Island the week of October 6, 2008 and last through the end of October.

7. The extension sought is a joint request and not for the purpose of delay.

WHEREFORE, the parties respectfully request that the Court extend discovery for an additional sixty (60) days, to December 12, 2008.

Respectfully submitted,

**s/Joanne M. Rogers**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 11, 2008, I electronically filed the foregoing ***JOINT MOTION TO EXTEND DISCOVERY*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s):

Elizabeth Hubbard  
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**s/Joanne M. Rogers**

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